



U.S. Department of Justice

United States Attorney  
Southern District of New York

United States District Courthouse  
300 Quarropas Street  
White Plains, New York 10601

May 9, 2008

RECEIVED  
ENDORSED

BY HAND

The Honorable Mark D. Fox  
United States Magistrate Judge  
United States District Court  
300 Quarropas Street  
White Plains, NY 10601

Re: United States v. German Cuadrado et al.,  
S4 07 Cr. 387

Dear Judge Fox:

The United States writes to request that certain docket entries in the above-captioned case be unsealed. Specifically, the United States requests that docket entries for the guilty plea proceedings for: Jorge Flores, on August 16, 2007 (Judge Yanthis); German Cuadrado, on September 7, 2007 (Judge Yanthis); Juan Camacho, on November 15, 2007 (Judge Fox); and Saile Parra, on March 11, 2008 (Judge Yanthis) be unsealed. The Court granted this request yesterday, with the caveat that such unsealing was to be solely for the purpose of transcripts.

In addition to requiring access so that transcripts can be made of the guilty plea proceedings, however, the Government also needs access to the documents in these docket entries so that certain documents therein may be copied and provided to defense counsel as 3500 material in advance of trial. Therefore, the Government requests the unsealing of the entire docket entries for those guilty plea proceedings. The Government makes this request with the consent of counsel for Flores, Cuadrado, Camacho, and Parra. Finally, the Government requests that the original plea

agreements and/or Pimentel letters from each of these proceedings be transferred to the custody of the Government, as is once again the practice in this District.

Respectfully Submitted,

MICHAEL J. GARCIA  
United States Attorney

By: Nola Heller /as  
Nola B. Heller  
Assistant United States Attorney  
(212) 637-2631